

EXHIBIT D

I do, but I think you should be able to call a non-WhatsApp number using WhatsApp?

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>
Cc: Jeremy Roller <jroller@aretelaw.com>

13 January 2024 at 21:59

Hi Jonah,
Yes I think you are correct. I'm sure we'll be ok and we have email as a backup.

I do have a request if it's not too much trouble.

There is a classic book called *The Art of Character Licensing* by Richard Wincor which I own a copy of, and which I have relied on in my career to gain knowledge of how to protect my own work.

<https://store.legal.thomsonreuters.com/law-products/Practice-Materials/The-Art-of-Character-Licensing/p/100001752>

It may be helpful to our discussions If you could at least briefly familiarize yourselves with the essence of that book as it may give you some insight into my own copyright law erudition, and why I have a desire to protect my own intellectual property, as well as my deep understanding of complex copyright licensing issues in general.

Trev

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>
Cc: Jeremy Roller <jroller@aretelaw.com>

17 January 2024 at 13:10

Hi,

Re Today's conference call,

Topics for discussion in advance.

(i) ground rules;

In this meeting I hope we can remain professional and cordial. For my part I recognise you are “doing your job” representing your client in their best interests and I shall respect you as such.

I want to speak openly but nothing I say in this meeting should be used against me, or to prejudice me in any way. I may be nervous and may not be able to express things correctly.

Nothing I say is meant to be disparaging or detrimental to anyone especially to “anyone's employment status” including but not limited to at Valve Corporation ,and such things should be “off record” as I may mention people and their actions without them being able to answer for themselves.

(ii) topics to be addressed

My main topic is “chain of title” and I hope that this is a familiar enough topic to parties present regarding Film and Game related copyrights, adaptations and Distribution.

BAYLIS_I

I would also like to find out what can be agreed upon such as the existence of copyright to my work. (Chain of title Issue)

My evidence of being unemployed at the time of creating such work. (Chain of title issue)

The amateur Nature of Wreck-a-Movie film Ethos and the amateur nature of Iron Sky in general.

The “country of origin” rule under Berne Convention Article 5 (4) (a) (Chain of title issue)

DMCA rules 512 (c) in general and,

Section 512(c)(1)(B) which specifies that for a service provider to be eligible for the safe harbor applicable to online storage functions, the provider must not receive a “financial benefit directly attributable to the infringing activity” that it has the “right and ability to control.

(iii) materials prepared to bring and exchange

In good faith, I am prepared to provide an original 3D animation file from Iron Sky by email during our conference if it will help provide some context as to “my name appearing in the Meta Data of the file itself”,

gwb_front_section_with_weapons_rigs.mb

This file is around 9,8mb and is dated 20th April 2011.

It is a main scene file for the space craft George W Bush. It relies on other files but they are not necessary for demonstration at this stage.

The file can be opened up in a basic Text Editing software such as on a Mac “Text Edit” of PC “Note Pad”

Then it is possible to search for the word “trev” using the search function of the Text Editor. (It may work with Word and Open Office too)

e.g.

0###FOR4###eFRDIFRDI###C#####I:/maya_work/vessels/gwb//scenes/weapon_gauss_2gun_rig_t
rev.mb#weapon_gauss_2gun

Please let me know if you have any questions that I can address for yourselves

Kind regards

Trev

[Quoted text hidden]

Jonah Harrison <jharrison@aretelaw.com>
To: Trevor Baylis <trevor.baylis@gmail.com>
Cc: Jeremy Roller <jroller@aretelaw.com>

17 January 2024 at 19:13

Good morning, Trev,

Thanks for the email. I very much appreciate the cordial and courteous tone – that’s my approach to litigation as well.

On the subject matter you list below, I understand how you may be confused. The things you mention below are not what are on the schedule for today. What we have to discuss are very specific topics ordered by the court (in addition, we need to discuss the topics set forth in FRCP 26(f):

(f) Conference of the Parties; Planning for Discovery

The rule is intended to promote the just, efficient, speedy, and economical determination of every action and proceeding and to promote, wherever possible, the prompt resolution of discovery disputes without court intervention. Counsel are expected to cooperate with each other to reasonably limit discovery requests, to facilitate the exchange of discoverable information, and to reduce the costs of discovery.

The proportionality standard set forth in Fed. R. Civ. P. 26(b)(1) must be applied in every case when parties formulate a discovery plan and promulgate discovery requests. To further the application of the proportionality standard in discovery, discovery requests and related responses should be reasonably targeted, clear, and as specific as possible.

(1) Prior to the initial status conference with the court, if any, or prior to submitting their joint status report, counsel and any pro se parties shall meet and discuss, and address in their joint status report if the court orders one, the topics set forth in Fed. R. Civ. P. 26(f) and the following issues:

- (A) possibilities for promptly settling or otherwise resolving the case;
- (B) whether the parties plan to engage in some form of alternative dispute resolution (“ADR”), such as mediation or the individualized trial program set forth in LCR 39.2, when they plan to engage in ADR, or why the parties do not plan to engage in ADR;
- (C) the existence of any related cases pending before this court or in another jurisdiction as set forth in LCR 3(g) and (h) and a proposal for how to handle the related cases;
- (D) a statement of how discovery will be managed to promote the expeditious and inexpensive resolution of the case, including but not limited to:
 - (i) forgoing or limiting depositions or exchanging documents informally;
 - (ii) agreeing to share discovery from third parties and the cost of obtaining that discovery;
 - (iii) scheduling discovery or case management conferences with the judge assigned to the case as necessary;
 - (iv) presenting discovery disputes to the court by informal means;



ARETE LAW GROUP
1218 THIRD AVENUE
SUITE 2100
SEATTLE, WA 98101
(206) 428-3250

[Quoted text hidden]

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>
Cc: Jeremy Roller <jroller@aretelaw.com>

17 January 2024 at 21:07

so this is the number you gave

001 206-428-3253

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>

17 January 2024 at 21:07

ok

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>

17 January 2024 at 21:28

<https://ktlaki.fi/en/personnel/max-tuominen/>

[Quoted text hidden]

Jonah Harrison <jharrison@aretelaw.com>
To: Trevor Baylis <trevor.baylis@gmail.com>

17 January 2024 at 22:41

I'm sorry, who is Max Tuominen?

[Quoted text hidden]

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>

17 January 2024 at 22:55

He is the lead lawyer for the Bankruptcy estate.

Here are some links,

<https://yle.fi/a/3-11592708>

<http://avalantiedotteet.blogspot.com/2021/01/vi-konkurssi-ilmoitus-iron-sky-universe.html>

IRON SKY UNIVERSE OY BANKRUPTCY ESTATE

Kemppi & Tuominen Attorneys Ltd

Mannerheimintie 113, 00280 Helsinki

Tel. +358 10 235 2120

email: avustaja@ktlaki.fi; toimisto@ktlaki.fi

www.ktlaki.fi"

<https://www.indiegogo.com/projects/iron-sky-the-coming-race--3#/comments>

They have a registration at US©O too. (screengrab)

Registration Number Not Verified: PAU003749092

https://cocatalog.loc.gov/cgi-bin/Pwebrecon.cgi?v1=9&ti=1,9&Search%5FArg=iron%20sky&Search%5FCode=TALL&CNT=25&PID=Pf4GLM7k9pZv8_HrZQFR369CUL2X&SEQ=20240117155330&SID=3

[Quoted text hidden]



Screenshot 2024-01-17 at 12.30.56.png
590K

Trevor Baylis <trevor.baylis@gmail.com>
To: Jonah Harrison <jharrison@aretelaw.com>

19 January 2024 at 21:29

Also here is some Info on Tero Kaukomaa who was the main Producer for Iron Sky.

He was headquartered in Switzerland where he has lived there for more than 20 years! :)

"Tero Kaukomaa: ...I have lived in Zurich for over 20 years"

<https://web.archive.org/web/20201020062200/https://www.starburstmagazine.com/features/tero-kaukomaa-mad-heidi/>

https://rocketreach.co/tero-kaukomaa-email_3867792

<https://www.zefix.ch/en/search/entity/list/firm/738200>

[Quoted text hidden]